

**REMARKS****I. Status of the Claims:**

Claims 1, 2, 5, 6 and 9-24 are currently pending. Claims 1, 2, 5 and 6 are withdrawn from consideration and Claims 17-24 are allowed.

By this Amendment, Claims 9-16 have been amended and Claims 1, 2, 5 and 6 have been cancelled without prejudice or disclaimer. No new matter has been introduced by this Amendment.

Upon entry of this Amendment, claims 9-24 would be pending.

**II. Drawings:**

The Examiner required that Figures 18-28 be corrected to reflect that these figures depict "prior art". Therefore, attached is a Submission of Drawings with amended Figures 18-28.

**III. Specification:**

The Specification has been amended to satisfy the Examiner's objections to the informalities.

**IV. Correction of Inventorship:**

Attached is a Request to Correct Inventorship Under 37 C.F.R. §1.48(b).

**IV. Rejection Under 35 U.S.C. §102:**

Claims 9-16 have been amended.

**A. Claim 9 and 13 (Dockser):**

Claims 9 and 13 have been rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 5,764,357 to Dockser. Applicants respectfully disagree with the Examiner's assertion that claims 9-16 are anticipated by the aforementioned references. First, the Examiner asserts that (1) element 10 of Fig. 1 of Dockser teaches the claim storage devices of claim 9; (2) the buses connecting elements 10 and 20 in Fig. 1 of Dockser teach the reader of claim 9; (3) elements 20, 30, 40 and 50 of Fig. 1 of Dockser teach the counter of claim 9; and (4) element 60 of Fig. 1 of Dockser teaches the encoder of claim 9 of the present invention. Dockser, however, fails to make any reference a plurality of second storages that respectively store data sequentially output from the counter. Nor does Dockser disclose a selector that sequentially selects any of the data respectively stored in the plurality of second storages and outputs the same as claimed in amended claim 9. Similarly, Dockser fails to disclose these corresponding steps of method claim 13. Accordingly, Applicants respectfully submit that Dockser fails to teach or disclose each and every element of amended claims 9 and 13. Accordingly, withdrawal of these rejections under 35 U.S.C § 102(e) is requested.

**B. Claims 9-10 and 13-14 (Kim):**

Claims 9-10 and 13-14 have been rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,055,272 to Kim. Applicants respectfully disagree with the Examiner's assertions. The Examiner contends that (1) the lines inputting the odd and even coefficients into element 10 of Fig. 1 of Kim teach the plurality of data buses of claim 10 of the present invention; and (2) element 10 of Fig. 1 of Kim teaches the claimed counter, plurality of data storage and selector of claim 10; and (3) the VLC unit 5 corresponds to the encoder of claim 10. Kim, however, fails to make reference to whether element 10 has any function that corresponds to the

claimed features. Specifically, neither col. 2, lines 7-14, col. 3, lines 21-42, col. 4, lines 48-55 nor col. 6, lines 8-14 provide any teaching concerning these distinctly claimed features.

Along these lines, Kim also fails to disclose the claimed selector and encoder of claim 9 as discussed above with respect to Dockser. These arguments regarding claims 9 and 10 apply with equal force to amended method claims 13 and 14 for Huffman encoding that include specific steps, among others, of storing, counting and sequentially selecting. Kim simply fails to teach or disclose these distinct features of amended method claims 13 and 14. Accordingly, Applicants respectfully submit that Kim fails to teach or disclose each and every element of amended claims 9-10 and 13-14. Accordingly, withdrawal of these rejections under 35 U.S.C § 102(e) is requested.

#### **C. Claim 11-12 and 15-16 (Jan)**

Claims 11-12 and 15-16 have been rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,363,097 to Jan. Applicants respectfully disagree with the Examiner's assertions. The Examiner contends that (1) the variable length decoder (VLD); (2) a plurality of data buffers 52-1 and 52-6; and (3) a plurality of run-length decoder (RLDs) 55-1 to 55-6 of Fig. 5 of Jan teach the claimed generator, storage and writer of claims 11 and 12 and the data buses of claim 12 as well as the corresponding features of method claims 15 and 16. Applicants submit, however, that unlike the present invention in which DCT coefficients are generated based on the data output from the plurality of data storage, in Jan the plurality of RLDs 55-1 to 55-6 of Fig. 5 are supplied with outputs of the data buffers 52-1 to 52-6. This argument applies with equal force to method claims 15 and 16 that include corresponding generating and writing steps. Thus, claim 11-12 and 15-16 of the present invention and Jan are distinguishable.

Accordingly, Applicants respectfully submit that Jan fails to teach or disclose each and every element of amended claims 11-12 and 15-16. Accordingly, withdrawal of these rejections under 35 U.S.C § 102(b) is requested.

**CONCLUSION**

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

**AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 3620-4010. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 3620-4010. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted,  
MORGAN & FINNEGAN, L.L.P.

Dated: \_\_\_\_\_

5/17/04

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